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ATTORNEYS FOR LESLIE PRITCHARD/DEFENDANTS

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

IN RE:	§	
	§	
MICHAEL STEPHEN GALMOR,	§	CASE NO. 18-20209-RLJ-7
	§	
Debtor.	§	
	§	
And	§	
	§	
GALMOR'S/G&G STEAM SERVICE,	§	CASE NO. 18-20210-RLJ-7
INC.,	§	
	§	
Debtor.	§	
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KENT RIES, TRUSTEE,	§	
	§	
Plaintiff,	§	
	§	
v.	§	ADVERSARY NO. 20-2003
	§	
GALMOR FAMILY LIMITED	§	
PARTNERSHIP and GALMOR	§	
MANAGEMENT, L.L.C.,	§	
	§	
Defendants.	§	

**CROSS-MOTION OF LESLIE PRITCHARD FOR PARTIAL SUMMARY JUDGMENT**

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

COMES NOW, Leslie Pritchard ("Pritchard"), court-appointed liquidator for Galmor Family Limited Partnership (the "FLP"), a defendant in the above styled and numbered Adversary

Proceeding, and files this her *Cross-Motion for Partial Summary Judgment* (the “Cross Motion”), respectfully stating as follows:

By this Motion, Pritchard requests that the Court enter summary judgment in her favor with respect to the following claims and causes of action asserted in this Adversary Proceeding by Kent Ries, Trustee (the “Trustee”):

1. Denying the Trustee’s claim for money had and received in full with respect to the Trustee’s claim that \$1,096,051.32 (the “Alleged Debt”) is allegedly owed by the FLP to Galmor’s/G&G Steam Service, Inc. (the “Debtor”).
2. Denying the Trustee’s claims, for breach of contract and *quantum meruit*, with respect to the following invoices comprising the Alleged Debt, on the basis of the Statute of Limitations:
  - (i) Invoice No. 121090 dated July 25, 2014 for \$80,880.16; and
  - (ii) Invoice No. 120423 dated June 30, 2014 for \$44,064.35.
3. Denying the Trustee’s claims, for unjust enrichment and money had and received, with respect to the following invoices comprising the Alleged Debt, on the basis of the Statute of Limitations:

<u>Number</u>	<u>Date/Bates</u>	<u>Amount</u>
121693	8/29/2014 (SG 016741)	\$842.03
121188	8/11/2014 (SG 016742)	\$1,950.00
121090	7/25/2014 (SG 016891-97)	\$80,880.16
127966	9/30/2016 (mostly for pre-6/19/2016 services) SG 016900-	\$72,540.90
126112	10/31/2015 (SG 016904)	\$107,636.27
120423	6/30/2014 (SG 016911)	\$44,064.35
121125	7/31/2014 (SG 016912)	\$5,251.57
121994	8/31/2014 (SG 016913)	\$6,691.41
122454	9/30/2014 (SG 016914)	\$6,372.43
123004	10/31/2014 (SG 016915)	\$7,161.89
123558	11/30/2014 (SG 016916)	\$13,522.47
123993	12/31/2014 (SG 016917)	\$11,976.04
124565	1/31/2015 (SG 016918)	\$10,869.22

4. Denying the Trustee's claims, for unjust enrichment and money had and received, with respect to \$453,850.00 of the rock quarry royalties allegedly advanced by the Debtor to the FLP, on the basis of the Statute of Limitations.
5. Denying the Trustee's claims that the Alleged Debt is supported or mandated by collateral estoppel or *res judicata*.

Pursuant to the Local Rules, Pritchard sets forth her arguments in support of this Cross Motion in the *Brief of Leslie Pritchard: (i) In Opposition to Trustee's Motion for Partial Summary Judgment; and (ii) In Support of Cross Motion for Partial Summary Judgment*, filed concurrently herewith.

Pursuant to the Local Rules, Pritchard sets forth her evidence in support of this Cross Motion in the *Appendix of Leslie Pritchard: (i) In Opposition to Trustee's Motion for Partial Summary Judgment; and (ii) In Support of Cross Motion for Partial Summary Judgment*, filed concurrently herewith. Without admitting the admissibility of any of the evidence therein, Pritchard also incorporates the *Affidavit of Matt Brooks* filed by the Trustee in support of his motion for partial summary judgment.

RESPECTFULLY SUBMITTED this 8th day of December, 2021.

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ Davor Rukavina

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**ATTORNEYS FOR LESLIE  
PRITCHARD / DEFENDANTS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this the 8th day of December, 2021, true and correct copies of this document were served via the Court's ECF system on parties entitled to notice thereby, including Kent Ries, Esq., the Trustee and Plaintiff.

By: /s/ Davor Rukavina

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Davor Rukavina, Esq.